

## UNITED STATES SECURITIES AND EXCHANGE COMMISSION NEW YORK REGIONAL OFFICE

200 VESEY STREET, SUITE 400 NEW YORK, NEW YORK 10281-1022

WRITER'S DIRECT DIAL LINE (212) 336-0121

October 4, 2019

## Via ECF

Hon. LaShann DeArcy Hall United States District Court Eastern District of New York 225 Camden Plaza East Brooklyn, New York 11201

Re: SEC v. Pereira

No. 19 Civ. 5527

Dear Judge Hall:

We represent the Plaintiff, Securities and Exchange Commission ("Commission"), in this action.

Enclosed for the Court's consideration is a proposed partial Judgment on consent against Defendant Gino M. Pereira. Pursuant to the proposed Judgment, Mr. Pereira consents to the imposition of an injunction against future violations of Section 10(b) of the Securities Exchange Act of 1934 ("Exchange Act"), and Rule 10b-5 thereunder, a permanent officer and director bar pursuant to Exchange Act Section 21(d)(2), and a penny stock bar pursuant to Exchange Act Section 21(d)(6). The proposed Judgment leaves monetary remedies for later resolution upon further consent or by the Commission's motion.

If the proposed Judgment is acceptable to the Court, we respectfully request that the Court docket it with its Consent.

Respectfully submitted,

Tejal D. Shah

cc: Peter Ginsberg, Esq.
Sullivan & Worcester LLP
1633 Broadway
New York, NY 10019